

October 04, 2004

Business Alaska
645 G Street Ste 100-782
Anchorage, Alaska 99501

Mr Jeff S Jordan
Supervisory Attorney
Federal Elections Commission

Re MUR 5534

Dear Mr Jordan

We are in receipt of your letter referenced above Business Alaska is a 501 (c) (6) non-profit organization incorporated on March 12, 2004 registered in the State of Alaska Business Alaska was created for the purpose of encouraging effective government in Alaska and our local communities Business Alaska goals and objectives are to provide a storehouse of information, advice and means for those who share our view of trustworthy leadership Business Alaska day-to-day functions are handled by the Executive Director while a seven member board provides overall direction

Regarding the letter of complaint, the complaint has indicated that we failed to register with the Federal Election Commission, failed to file with the Internal Revenue Service, and failed to terminate ad spots within the 60 day window

Business Alaska response is as follows Our understanding is that electioneering constitutes expenditure over the \$ 10,000 threshold Business Alaska expenditures were well under or approximately \$ 8349 95 Thus, we vigorously reject the assertion of electioneering Business Alaska has applied and received an EIN number (please see enclosed copy) from the Internal Revenue Service dated February 26, 2004 Our further understanding from the IRS is that we must make additional registration after one full year of operation This would be in March 2005 The complaint also indicated that Business Alaska has not filed with the local Alaska Public Offices Commission Again we are not required to file with said office Finally, Business Alaska ad spots ran from August 31st through September 3, 2004 Our understanding is that we are under the 60-day window as identified by the FEC Finally, we further understand that while we are required to file an FEC form 5 it will be filed on or before October 15, 2004

In summary Business Alaska did produce and direct television ad spot which cited Governor Knowles participation in the Pew Oceans Commission Our reference was the published Pew Report on the Commission which included a list of commission members

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Overall, it is Business Alaska view that the complaint is largely based on political bias and essentially has no basis. Further, we see the complaint as the Alaska Democratic Party attempt to provide stumbling blocks to the dissemination of bona fide information to the Alaskan Citizenry.

We thank the FEC for their prompt response in this matter and request that the complaint be terminated as there have been no violations.

Sincerely,



John L. Floyd

President, Business Alaska



Tom McGrath

Treasurer, Business Alaska

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State of Alaska
Department of Community and Economic Development
Division of Banking, Securities and Corporations

CERTIFICATE
OF
INCORPORATION
Nonprofit Corporation

The undersigned, as Commissioner of Community and Economic Development of the State of Alaska, hereby certifies that Articles of Incorporation of

BUSINESS ALASKA, INC.

have been received in this office and have been found to conform to law.

ACCORDINGLY, the undersigned, as Commissioner of Community and Economic Development, and by virtue of the authority vested in me by law, hereby issues this Certificate of Incorporation and attaches hereto the original copy of the Articles of Incorporation

IN TESTIMONY WHEREOF, I execute this certificate and
affix the Great Seal of the State of Alaska on
MARCH 12, 2004.

Edgar Blatchford

Edgar Blatchford
Commissioner

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